

United States District Court

SOUTHERN

DISTRICT OF
MCALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

1 Gabriel Antonio Wandstrand-Juarez
A206 895 008 YOB: 1995

Principal

Mexico

United States District Court
Southern District of Texas
FILED

Case Number:

M-15-0167-M

2 Salvador Rodriguez-Torres
A202 077 786 YOB: 1990

Co-Principal

Mexico

FEB 03 2015

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 2, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Ronal Yanil Chirinos-Mendoza and Anastacio Diaz-Alvarado, citizens of Honduras, and five (5) other undocumented aliens, for a total of seven (7) who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport, by foot, said aliens in furtherance of such violation of law within the United States, that is, from a location near Havanna, Texas to the point of arrest near Havanna, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONYI further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On February 1, 2015, at approximately 9:30 am, Border Patrol Agent Guillermo Rodriguez responded to a concern citizen call, regarding suspected undocumented aliens walking north near the Banworth packing shed, toward Expressway 83, in Havanna, Texas. This area is notorious for alien and narcotics smuggling. Agent Rodriguez encountered foot sign, in the area described by the caller and followed it. After following the foot sign, agent Rodriguez encountered 3 subjects in the brush. All 3 subjects admitted to being illegally in the United States.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Approved by: Leo J. Leo, III



Signature of Complainant

Derek Conrow Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

February 3, 2015

Date

at McAllen, Texas

City and State

Dorina Ramos, U. S. Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-15-0167-M

**RE: Gabriel Antonio Wandestrاند-Juarez A206 895 008
 Salvador Rodriguez-Torres A202 077 786**

CONTINUATION:

As Agent Rodriguez was interviewing the 3 illegal aliens, a group of people that was hiding close by began to run. With the assistance of other agents and Omaha (Air assist), 7 additional illegal aliens were apprehended in the brush. All ten were transported to the McAllen Border Patrol Station for processing.

At the station, and through interviews of the group, it was discovered that the initial 3 subjects that Agent Rodriguez apprehended were the foot guides for the rest of the group.

PRINCIPALS' STATEMENTS:

One of the foot guides was a juvenile and was granted a voluntary return to Mexico and was not charged. The remaining two foot guides, Gabriel Antonio WANDESTRAND-Juarez and Salvador RODRIGUEZ-Torres, were read their rights and refused to provide a statement.

MATERIAL WITNESSES' STATEMENTS:

Both material witnesses were read their rights. Both were willing to provide statements without the presence of an attorney.

1- Ronal Yanil Chirinos-Mendoza told agents he was charged \$7,000 (USD) to be smuggled into the United States. Chirinos stated he met three guides in Mexico on the riverbank, where the guides inflated a raft. After crossing the river on the raft, the guides told Chirinos and the rest of the group not to talk. The guide with the mustache also told them to run if they saw immigration. After walking for a while in the United States, they came to a tunnel that crossed under a road. The guides instructed the group to cross under the road in the tunnel. While crossing, the guide with the mustache was on the phone with the driver of the vehicle that was supposed to pick up the group. He apparently didn't have a signal, so he instructed the other guide to send the driver a text. The load driver then called the guide with the mustache.

Later, the group heard a helicopter, so the foot guides told the group to hide face down in the brush. The foot guide with the mustache told the group to give him any Mexican money they had on their person, because they would not have any use for it anymore. Chirinos gave him his money because he was scared. Shortly after, Border Patrol arrived, and everyone was arrested. Chirinos was able to identify RODRIGUEZ (Mustache) and WANDESTRAND in photo lineups as the foot guides.

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CONTINUATION:

2- Anastacio Diaz-Alvarado stated he was charged \$1,800 (USD) to be smuggled into the United States. Diaz told agents on the morning of his apprehension, he met the foot guides in Mexico. There, the foot guides inflated a raft and crossed them into the United States. Prior to crossing the river, the foot guides told the group that the guides would be in front, and the group was not to make any noise. After crossing the river, and walking through the brush, the group crossed a road in a tunnel. The guides then instructed them to hide because there was a helicopter in the area. Diaz also told agents that the guides told the group to hand over any money they had, but Diaz did not have any. Diaz identified RODRIGUEZ and WANDESTRAND in a photo lineup as the group's foot guides.